

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

RYAN DEVEREAUX, et. al.,)	
)	
Plaintiffs,)	
)	
vs.)	Cause no. 4:15CV00553 RWS
)	
ST. LOUIS COUNTY POLICE DPT., et. al.,)	
)	
Defendant.)	

INITIAL RESPONSE TO MOTION TO QUASH FILED BY SLMPD

COMES NOW, Plaintiffs, by and through counsel, and in response to the Motion to Quash filed by the St. Louis Metropolitan Police Department, state as follows:

1. On or about July 9, 2015, Plaintiffs served a subpoena duces tecum on the Custodian of Records of the St. Louis Metropolitan Police Department (SLMPD) for certain records Plaintiffs contend are relevant to the issues in this case and are in the possession or reasonably available to the Custodian;
2. On July 20, 2015, the attorney for the SLMPD filed its Motion to Quash challenging every request;
3. Counsel for the Plaintiffs has been in contact with counsel for SLMPD in an attempt to resolve the issues raised in the Motion and in to further those endeavors has submitted an amended set of particulars to counsel for SLMPD;
4. The attorneys and the attorney for SLMPD believe that most, if not all, of the Custodian's objections can be resolved through continued negotiations in the next 21 days.

5. Plaintiffs do not wish or intend to waive any response to the allegations in the Motion to Quash but wish to preserve their right to respond until after these negotiations are completed.

Respectfully Submitted,

SINDEL, SINDEL, & NOBLE, P.C.

/s/ Richard H. Sindel

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CERTIFICATE OF SERVICE

I hereby certify that on this 24th day of July, 2015, a copy of the foregoing **INITIAL RESPONSE TO MOTION TO QUASH FILED BY SLMPD** was filed electronically with the Clerk of the Court in the United States District Court, Eastern District of Missouri, Eastern Division.

/s/ Richard H. Sindel